

EXHIBIT 16

**EXHIBIT A TO STIPULATION AND ORDER FOR THE
IMAGING, PRESERVATION, AND PRODUCTION OF DOCUMENTS**

Consistent with the obligations under the "Stipulation and Order for the Imaging, Preservation, and Production of Documents," I certify that:

1. The following are all the Social Media Accounts, as defined in ¶ 2(xi) of the Stipulation and Order, that contain potentially relevant Documents:

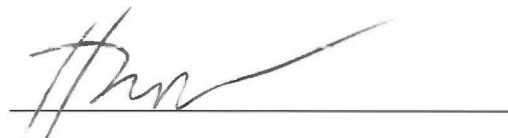
Username	Provider/Platform	Nature of Responsive Documents on Account
@AmericanVanguard	Twitter	Media
@VanAnOfficial	Twitter	"
@TheAmVanguard	"	"
@VanguardAU	"	"
@Vanguard-Italy	"	"
Thomas Ryan	Discord	chat
Thomas Ryan	Discord	chat
Commander #770	Discord	chat

2. The following are all the Electronic Devices, as defined in ¶ 2(vi) of the Stipulation and Order, that I have possessed since January 1, 2017 that may contain any potentially relevant Documents or ESI:

Device Type (e.g., iPhone 7)	Size (e.g., 32 GB)	Nature of Responsive Documents on Device
Samsung Galaxy S		Texts w/ Dillon Hopper, Texts w/ Matt Hambach
Samsung Galaxy S - Broken		Texts w/ Dillon Hopper
Dell Laptop		

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 10/16/19.



Party